



Department of the Interior - Indian Affairs
2014 Environmental Management Assessment and Performance Program

Division of Environmental and Cultural Resources Management
12220 Sunrise Valley Drive
Reston, Virginia 20191

Audit Start Date 10/28/2013 : Audit Completion Date 10/30/2013

**Environmental Management Assessment and Performance
Program(EMAP) Audit Summary Report**
Prepared for EPA

L03-01 Haskell Indian Nations University
155 Indian Ave - Lawrence, KS 66046





EPA Audit Report



L03-01 Haskell Indian Nations University on 10/28/2013 - 10/30/2013 (EMAP (v 1)) by Steinke, Nick
PWS ID#N/A

Air Pollution

| Finding | Days NC |
|---|---------|
| Failure to obtain approval for an air emission source. Kansas Administrative Regulation (KAR) 28-19-300(b). | Unknown |
| Recommended Corrective Actions | |
| In 2012, the School installed one 78 hp, natural gas-fired emergency generator to provide backup power to the IT program. The generator is subject to New Source Performance Standard (NSPS) Subpart JJJJ; as such, the School is required by the Kansas Department of Health and Environment (KDHE) to obtain approval to construct the generator. | |

Hazardous Waste Management

| Finding | Days NC |
|---|---------|
| Failure to comply with the Conditionally Exempt Small Quantity Generator Requirements. Kansas Administrative Regulation (KAR) 28-31 | Unknown |
| Recommended Corrective Actions | |
| Based upon the School's operations and activities, the School appears to be a CESQG. The Kansas Department of Health and Environment (KDHE) has state-specific CESQG regulations that are more stringent than the federal requirements. Requirements applicable to the School include, but are not limited to: making a hazardous waste determination; inspecting hazardous waste storage areas monthly; and documenting monthly inspections. | |

Miscellaneous Maintenance Wastes

| Finding | Days NC |
|---|---------|
| 8. Failure to properly dispose of universal wastes within one-year of universal waste designation. 40 CFR 273.15(a,b); 40 CFR 273.45 (a,b) (RCRA) | Unknown |
| Recommended Corrective Actions | |
| Properly dispose of universal waste such as batteries, lamps, thermostats, and pesticides within one- year once the material has been designated a waste. Do not accumulate longer than one year from the date they become wastes. Dispose of in accordance to the manufacturers guidance or according to the facilities standard operating procedure. Maintain records of accumulation start dates and disposal dates in the record location specified in the EMS. | |
| Finding | Days NC |
| 10. Failure to inform employees on handling and operating procedures for universal waste - including emergency response procedures in case of a release. 40 CFR 273.16; or 40 CFR 273.36 (RCRA) | Unknown |
| Recommended Corrective Actions | |
| Provide clear instruction and training to employees who have responsibility for managing used batteries, lamps, pesticides and/o mercury containing thermostats. Include emergency response procedures / actions to be taken for releases from leaking containers or broken lamps. Document the instructions and employee training in the record location specified in the EMS. | |
| Finding | Days NC |
| 15. Failure to clearly label universal waste containers. 40 CFR 273.14(a-e); 40 CFR 273.14 (RCRA) | Unknown |
| Recommended Corrective Actions | |
| Clearly label universal waste, or a container used to store universal waste, with any one of the following phrases: "Universal Waste Battery(ies)", or "Waste Battery(ies)", or "Used Battery(ies)"; "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"; "Universal Waste—Mercury Containing Equipment," "Waste Mercury-Containing Equipment," or "Used Mercury-Containing Equipment" or, "Universal Waste—Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)". | |



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Oil Pollution

| Finding | Days NC |
|--|---------|
| 2. Failure to prevent a discharge of oil and violation of water quality standards. 40 CFR 110.3(a) (OPA/CWA) | Unknown |
| Recommended Corrective Actions | |
| Maintain lock-outs on valves installed in bermed areas. Routinely monitor catchment basins and bermed areas to ensure accidental releases do not occur. Consider additional monitoring during and after rain events. Bermed/catch basin areas should be inspected regularly and included in the SPCCP. Inspection logs of the areas should be simple and maintained on site. | |

Solid Waste Management

| Finding | Days NC |
|---|---------|
| 1. Failure to properly store solid wastes to prevent fly-aways and/or spillage. 40 CFR 243 (SWDA) | Unknown |
| Recommended Corrective Actions | |
| Properly store all solids wastes (or materials which have been separated for the purpose of recycling) so it does not constitute a fire, health or safety hazard or provide food or harborage for vectors, including no spillage or flyaways. | |

Spill Prevention Control and Countermeasure Planning

| Finding | Days NC |
|---|---------|
| 5. Failure to conduct inspections and tests in accordance with the written procedures in the SPCC plan. 40 CFR 112.7(e) (SPCC) | Unknown |
| Recommended Corrective Actions | |
| Conduct inspections and tests as required in accordance with written procedures that you or the certifying engineer developed for the facility. Keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years. Records of inspections and tests are to be maintained in the specified location of the EMS. | |

| Finding | Days NC |
|--|---------|
| 24. Failure to clean up visible oil/fuel leaks. 40 CFR 112.7(e)(3)(iv) (SPCC) | Unknown |
| Recommended Corrective Actions | |
| Immediately clean up any oil/fuel spill using the proper spill response procedures and equipment. Dispose and manage the waste as hazardous. Properly train personnel of emergency response procedures to cleanup of spills and accidental releases. Maintain spill reporting/notification documents and disposal records in the file location referenced in the EMS. Report spill/release incident to the NRC if the material entered surface water. Maintain a copy of all reported releases in the EMS. | |

| Finding | Days NC |
|--|---------|
| 29. Failure to conduct spill prevention briefings to ensure adequate understanding of the SPCC Plan. 40 CFR 112.7(f) (SPCC) | 400 |
| Recommended Corrective Actions | |
| Conduct spill prevention briefings, including descriptions of potential spill events, spill prevention methods, and spill response, for operations personnel at intervals frequent enough (at a minimum, annually) to assure adequate understanding of the SPCC Plan. Document briefings and maintain the record in the file location referenced in the EMS. | |



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Toxic Substances Management

| Finding | Days NC |
|---|---------|
| 38. Failure to properly dispose of PCB waste within one year of becoming a waste. 40 CFR 761.65(a)(1) (TSCA) | Unknown |
| Recommended Corrective Actions | |
| Properly dispose of PCB waste within one year after becoming a waste by completing a waste manifest. Label waste PCBs with the start accumulation date. | |

| Finding | Days NC |
|--|---------|
| 49. Failure to inspect all PCB items in storage for leaks every 30 days. 40 CFR 761.65(c)(5) (TSCA) | Unknown |
| Recommended Corrective Actions | |
| Inspect all PCB items in the PCB waste storage area for leaks every thirty days. Maintain a written inspection log to verify inspection as specified in 761.180(a)(iii). Develop a SOP for PCB management. Assign staff roles and responsibilities; and provide training. Reference SOP and staff roles/responsibilities in the EMS. | |

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A copy of the information provided by IA to the Auditor regarding the date each building at the facility was constructed, if reasonably know is provided as an attachment